

August 9, 2004

VIA CERTIFIED MAIL

RUTGERS Organics Corporation

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**Re: JULY 2004 MONTHLY REPORT
RI/FS & REMOVAL ACTION
NEASE CHEMICAL SITE
SALEM, OHIO**

In accordance with Paragraph X E of the Administrative Order by Consent regarding a Remedial Investigation/Feasibility Study (RI/FS) of the Nease Chemical Site in Salem, Ohio, attached is a copy of the July 2004 RI/FS Progress Report.

Additionally, in accordance with Paragraph 14 of the Administrative Order by Consent, signed November 17, 1993, attached is a copy of the July 2004 Removal Action Progress Report.

Please contact us if you have any questions regarding activities discussed in these reports.

Sincerely,

A handwritten signature in black ink that reads "Rainer F. Domalski".

Dr. Rainer F. Domalski
Manager Remediation Projects

Enclosure

cc: M. Hardy – Thompson Hine
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**NEASE CHEMICAL SITE, SALEM, OHIO
REMEDIAL INVESTIGATION/FEASIBILITY STUDY
MONTHLY PROGRESS REPORT
JULY 2004**

1.0 INTRODUCTION

This progress report has been prepared in accordance with Paragraph XE of the Administrative Order of Consent regarding a Remedial Investigation/Feasibility Study of the Nease Chemical Site in Salem, Ohio. The report summarizes the major RI/FS actions during the month along with investigation results and any problems encountered in the project. Activities planned for next month are also presented.

2.0 SUMMARY OF ACTIVITIES PERFORMED

2.1 Project Activity Summary

The activities that were initiated and/or completed during the month are described. All activities were performed in accordance with the detailed protocol provided in the approved Work Plan.

2.2 Fieldwork

No fieldwork occurred during this month.

2.3 Reports

2.3.1 Remedial Investigation - Endangerment Assessment (EA)

Based on 2002 comments from the agencies, a revised Endangerment Assessment was submitted in April (Chapter I through VIII; Health) and June 2003 (Chapter IX and X; Ecological). It is currently under agencies' final review. On February 9, 2004, OEPA submitted its comments regarding the ecological assessment. USEPA Region V submitted its comments in March 16, 2004. ROC submitted the draft final EA on April 26, 2004.

On March 18, 2003, the agencies and ROC had a meeting regarding the upcoming Feasibility Study (FS). The parties discussed site conceptual model, proposed operational units (OU 1- 4), remedial actions objectives and technology screening (OU-2). A follow-up meeting was held on October 15, 2003. ROC presented the results from July 2003 groundwater sampling round and its meaning for the site remediation. The parties also discussed the Remedial Action Objectives and the remedial alternatives to be evaluated in the final document. US EPA Region V submitted its comments on March 16, 2004. OEPA's comments were received on May 6, 2004. The comments were discussed in a conference call; a response incl. a time schedule for the preparation of a draft FS was summarized in letter dated May 26, 2004. The draft FS (OU-2) needs to be submitted by August 26, 2004.

2.4 Meetings

No meeting was held during this month.

3.0 VARIATIONS FROM THE APPROVED RI/FS WORK PLAN

No variations from the approved Work Plans occurred during the month.

4.0 RESULTS OF SAMPLING, TESTS AND ANALYSES

No sampling was conducted during this month.

5.0 PROJECT SCHEDULE

The attached updated Work Plan schedule identifies completion and target dates for project activities. Those scheduled to occur over the next several months include:

- Prepare Feasibility Study (OU-2; groundwater and soil)

6.0 DIFFICULTIES ENCOUNTERED AND ACTION TAKEN TO RESOLVE PROBLEMS

No significant difficulties were encountered.

7.0 PERSONNEL CHANGES

US EPA Region V named Mary Logan as the new Remedial Project Manager for the Nease Chemical Site..

8.0 ANTICIPATED PROJECT ACTIVITIES FOR AUGUST 2004

- Monthly Progress Report August 2004
- Prepare Feasibility Study (OU-2)

Table 1
Nease Chemical Site, Salem, Ohio
RI/FS Schedule

| Date | Task/Activity/Deliverable/Milestone |
|----------------------|---|
| February 22, 1988 | Effective Date of RI/FS Administrative Order of Consent |
| April 5, 1991 | Partial Salem RI submitted to Agencies |
| July 6, 1993 | Salem RI submitted to Agencies |
| July 29-30, 1993 | Source sampling event, ROC/Golder and Agencies/B&V WST |
| August 10, 1993 | Submit monthly progress report |
| September 10, 1993 | Submit monthly progress report |
| October 10, 1993 | Submit monthly progress report |
| November 10, 1993 | Submit monthly progress report |
| Nov./Dec., 1993 | Egypt Swamp Sampling Event |
| December 10, 1993 | Submit monthly progress report |
| January 10, 1994 | Submit monthly progress report |
| February 10, 1994 | Submit monthly progress report |
| March 10, 1994 | Submit monthly progress report |
| March 30, 1994 | Submit Supplemental Production Well Closure Plan to Agencies |
| April 10, 1994 | Submit monthly progress report |
| May 10, 1994 | Submit monthly progress report |
| June 10, 1994 | Submit monthly progress report |
| July 10, 1994 | Submit monthly progress report |
| August 10, 1994 | Submit monthly progress report |
| August 18, 1994 | Submit to Agencies Additional RI Report: MFLBC |
| August 22, 1994 | Receipt of US EPA Draft Comments on 1993 Salem RI Report |
| September 6, 1994 | Receipt of US EPA Comments on 1993 Salem RI Report |
| September 10, 1994 | Submit monthly progress report |
| September 23, 1994 | Receipt of USEPA Comments on Well Closure Plan |
| October 7, 1994 | Submit Supplemental Production Well Closure Plan (Revision #1) |
| October 10, 1994 | Submit monthly progress report |
| November 8, 1994 | Receipt of USEPA approval of Well Closure Plan (Revision #1) |
| November 10, 1994 | Submit monthly progress report |
| December 10, 1994 | Submit monthly progress report |
| December 13-19, 1994 | Production Well Closure Field Work |
| January 10, 1995 | Submit monthly progress report |
| February 10, 1995 | Submit monthly progress report |
| February 27, 1995 | Receipt of USEPA Comments to Additional Remedial Investigation Report |
| March 10, 1995 | Submit monthly progress report |
| March 30, 1995 | Revised MFLBC Sampling Plan submitted |
| April 10, 1995 | Submit monthly progress report |
| April 25, 1995 | Meet to finalize MFLBC Sampling Plan |
| May 10, 1995 | Submit monthly progress report |

| Date | Task/Activity/Deliverable/Milestone |
|---------------------------------|--|
| June 6, 1995 | Propose groundwater sampling Round 3 |
| June 10, 1995 | Submit monthly progress report |
| June 30, 1995 | Receive agency comments to groundwater sampling Round 3 proposal |
| July 5, 1995 | Receive agency approval of MFLBC Sampling Plan |
| July 6, 1995 | Submit revised Round 3 groundwater sampling proposal |
| July 10, 1995 | Submit monthly progress report |
| August 1, 1995 | Receive Agency approval for CAL MPK analysis |
| August 4, 1995 | Submit Rt. 14/Feeder Creek Plan to Agencies |
| August 10, 1995 | Submit monthly progress report |
| September 5-15, 1995 | Anticipated MFLBC phase III Sample Collection |
| September 10, 1995 | Submit monthly progress report |
| September 12, 1995 | Receive agency comments on Rt. 14/Feeder Creek Sampling Plan |
| September 18-30, 1995 | Round 3 Groundwater Collection |
| October 6, 1995 | Submit revised Rt. 14/Feeder Creek Sampling Plan |
| October 25, 1995 | Resubmit revised Rt. 14/Feeder Creek Sampling (Verbal Comments) |
| October 30- November 2, 1995 | Collect Rt. 14/Feeder Creek Samples |
| November 10, 1995 | Submit monthly progress report |
| December 10, 1995 | Submit monthly progress report |
| December 28, 1995 | Receive Agency comments to Remedial Investigation Report |
| January 10, 1996 | Submit monthly progress report |
| January 31, 1996 | Submit Revised RI Report Volumes 1, 1A, 3 and 4 |
| February 10, 1996 | Submit monthly progress report |
| March 10, 1996 | Submit monthly progress report |
| April 10, 1996 | Submit monthly progress report |
| April 24, 1996 | Meeting with agencies to discuss project status and submittal dates |
| May 10, 1996 | Submit monthly progress report |
| May 24, 1996 | Submit Appendix N |
| June 10, 1996 | Submit monthly progress report |
| June 14, 1996 | Submit Round 3 Groundwater Sampling Data |
| June 19, 1996 | Revised RI Approved by EPA/OEPA |
| July 10, 1996 | Submit monthly progress report |
| August 10, 1996 | Submit monthly progress report |
| September 6, 1996 | Submit monthly progress report |
| September 11, 1996 | Meeting with Agencies to discuss Endangerment Assessment Comments |
| October 10, 1996 | Submit monthly progress report, Submit revised Rt. 14/FC Investigation Results, Submit revised Eastern Plume/DNAPL Work Plan |
| November 10, 1996 | Submit monthly progress report |
| December 10, 1996 | Submit monthly progress report |
| December, 1996 | Complete Fieldwork E. Plume/DNAPL Workplan |
| January 10, 1997 | Submit monthly progress report |
| January 23, 1997 | Piezometer (hydropunch) sampling conducted |
| February 7, 1997 | Submit monthly progress report |

| Date | Task/Activity/Deliverable/Milestone |
|--------------------|--|
| March 7, 1997 | Submit monthly progress report |
| March 25, 1997 | Receive agency comments on E. Plume/DNAPL Workplan |
| April 10, 1997 | Submit monthly progress report |
| May 9, 1997 | Submit monthly progress report |
| June 9, 1997 | Submit monthly progress report |
| June 30, 1997 | Receive Agency comments on Appendix N, RI |
| July 8, 1997 | Submit monthly progress report |
| July 18, 1997 | Submit revision package for Appendix N addressing agency comments |
| August 8, 1997 | Submit DNAPL/Eastern Plume Report and Monthly progress report |
| August 20, 1997 | Agency approval of Appendix N |
| September 10, 1997 | Submit monthly progress report |
| October 10, 1997 | Submit monthly progress report |
| November 10, 1997 | Submit monthly progress report |
| December 10, 1997 | Submit monthly progress report |
| December 18, 1997 | Receive (12/19/97) agency comments to previously submitted EA chapters |
| December 18, 1997 | Receive (12/29/97) USEPA Comments to Eastern Plume/DNAPL report |
| December 29, 1997 | Receive (12/31/97) OEPA Comments to Eastern Plume/DNAPL report |
| January 8, 1998 | Clarifications to agency EA comments requested by ROC letter |
| January 9, 1998 | Submit monthly progress report |
| January 13, 1998 | Telephone conference to obtain clarification on agency EA comments (human health) |
| January 22, 1998 | Meeting in US EPA's Chicago offices to discuss Eastern Plume/DNAPL report comments |
| January 28, 1998 | Telephone conference to obtain clarifications on agency EA comments |
| January 29, 1998 | Telephone conference to obtain clarifications on agency EA comments (Ecological and revision schedule) |
| February 3, 1998 | ROC letter regarding summary of previous EA clarification telephone calls |
| February 10, 1998 | Submit monthly progress report |
| February 12, 1998 | Meeting in Twinsburg, OH to discuss agency comment to EA chapters and approach for finalization of remaining chapters. |
| March 10, 1998 | Submit monthly progress report |
| April 1, 1998 | Receiver USEPA comments to revised Eastern Plume/DNAPL report |
| April 8, 1998 | Submit monthly progress report |
| April 15, 1998 | Submit Complete EA |
| May 7, 1998 | Submit monthly progress report |
| June 9, 1998 | Submit monthly progress report |
| July 10, 1998 | Submit monthly progress report |
| August 5, 1998 | Revised Eastern Plume/DNAPL report submitted |
| August 7, 1998 | Submit monthly progress report |
| August 14, 1998 | Receive draft agency comments on EA |
| August 26, 1998 | Meeting in Twinsburg, Ohio to discuss EA comments |
| September 10, 1998 | Submit monthly progress report |
| October 8, 1998 | Meeting to discuss EA technical issues (EPA office, Chicago) |
| October 9, 1998 | Submit monthly progress report |

| Date | Task/Activity/Deliverable/Milestone |
|--------------------|--|
| November 6, 1998 | Teleconference on EA comments |
| November 10, 1998 | Submit monthly progress report |
| November 30, 1998 | Receive additional agency comments on EA |
| December 10, 1998 | Submit monthly progress report |
| December 15, 1998 | Teleconference on EA comments |
| January 6, 1999 | Teleconference on EA comments (remaining item information status) |
| January 8, 1999 | Submit monthly progress report |
| January 22, 1999 | Submit EA Appendices |
| February 3, 1999 | Agency MFLBC Sampling Letter received |
| February 9, 1999 | Receive partial agency comments to EA/Appendices |
| February 10, 1999 | Submit monthly progress report |
| February 23, 1999 | ROC responds to MFLBC Sampling proposal |
| March 9, 1999 | Submit monthly progress report |
| March 16, 1999 | Receive additional agency comments to EA/Appendices, more anticipated |
| April 8, 1999 | Receive final agency comments to EA/Appendices |
| April 9, 1999 | Submit monthly progress report |
| May 10, 1999 | Submit monthly progress report |
| May 17, 1999 | Agency response letter to ROC MFLBC sampling proposal received |
| June 7, 1999 | Conference call to resolve details on MFLBC sampling program and locations |
| June 9, 1999 | Submit monthly progress report |
| June 18, 1999 | Submit revised EA |
| July 9, 1999 | Submit monthly progress report |
| July 12-21, 1999 | Conduct additional MFLBC field sampling work |
| July 28, 1999 | ROC proposal for Residential well sampling program via a conference call |
| August 8, 1999 | Submit monthly progress report |
| September 1, 1999 | Agency approval of residential well sampling program via a conference call |
| September 10, 1999 | Submit monthly progress report |
| October 8, 1999 | Submit monthly progress report |
| November 8, 1999 | Submit monthly progress report |
| December 9, 1999 | Submit monthly progress report |
| January 10, 2000 | Submit monthly progress report |
| January 11, 2000 | Conduct Residential Well Sampling Program |
| February 10, 2000 | Submit monthly progress report |
| March 8, 2000 | Submit monthly progress report |
| March 31, 2000 | Submit MFLBC Data Summary Report |
| April 4, 2000 | Submit monthly progress report |
| May 10, 2000 | Submit monthly progress report |
| June 7, 2000 | Submit Residential Well Sampling Results |
| June 8, 2000 | Submit monthly progress report |
| July 7, 2000 | Submit monthly progress report |
| July 31, 2000 | Received agency comment letter regarding draft Endangerment |

| Date | Task/Activity/Deliverable/Milestone |
|--------------------|---|
| | Assessment |
| August 8, 2000 | Submit monthly progress report |
| September 8, 2000 | Submit monthly progress report |
| October 4, 2000 | Submit monthly progress report |
| October 11, 2000 | Agencies/ROC meeting regarding agency's comments to draft Endangerment Assessment |
| November 3, 2000 | Submit monthly progress report |
| November 14, 2000 | Submit parts of the revised Endangerment Assessment (Chapter 1 – 4, 9) |
| December 8, 2000 | Submit monthly progress report |
| December 12, 2000 | Submit parts of the revised Endangerment Assessment (Chapter 10) |
| January 4, 2001 | Submit monthly progress report |
| February 6, 2001 | Submit monthly progress report |
| March 8, 2001 | Submit monthly progress report |
| April 9, 2001 | Submit monthly progress report |
| April 11, 2001 | Received agencies' comments regarding Appendix I |
| May 8, 2001 | Submit monthly progress report |
| May 18, 2001 | Received agencies' comments regarding Appendix I |
| June 6, 2001 | Submit monthly progress report |
| July 6, 2001 | Submit monthly progress report |
| August 7, 2001 | Submit monthly progress report |
| August 20, 2001 | Received agencies' comments regarding indoor air |
| September 7, 2001 | Received agencies' comments regarding dermal exposure |
| September 10, 2001 | Submit monthly progress report |
| September 18, 2001 | Initial response to agencies' September 7, 2001 letter |
| October 5, 2001 | Submit Monthly progress report |
| October 19, 2001 | Received agencies' comment letter regarding EA issues |
| November 2, 2001 | Response to agencies' comments October 19, 2001 |
| November 7, 2001 | Submit monthly progress report |
| December 7, 2001 | Submit monthly progress report |
| December 28, 2001 | Submit draft final Endangerment Assessment (Human Health) |
| January 9, 2001 | Submit monthly progress report |
| January 25, 2002 | Submit revised EA Chapters VI and VIII |
| February 8, 2002 | Submit monthly progress report |
| March 5, 2002 | Submit monthly progress report |
| April 5, 2002 | Submit monthly progress report |
| May 8, 2002 | Submit monthly progress report |
| June 5, 2002 | Submit monthly progress report |
| July 8, 2002 | Submit monthly progress report |
| August 9, 2002 | Submit monthly progress report |
| August 26, 2002 | EPA submit comments regarding ecological part of EA |
| September 10, 2002 | Submit monthly progress report |
| October 10, 2002 | Submit monthly progress report |
| October 30, 2002 | Submit Draft Endangerment Assessment (Human Health Part) |
| November 6, 2002 | Submit monthly progress report |
| December 3, 2002 | Meeting with the agencies regarding the ecological part of the EA |
| December 10, 2002 | Submit monthly progress report |
| December 30, 2002 | Agency comment letter regarding EA |
| January 9, 2003 | Submit progress report |
| February 5, 2003 | Submit monthly progress report |
| March 18, 2003 | Meeting between agencies and ROC regarding FS |
| March 19, 2003 | Submit monthly progress report |

| Date | Task/Activity/Deliverable/Milestone |
|-------------------|--|
| April 7, 2003 | Submit monthly progress report |
| April 25, 2003 | Submit revised EA Chapter I – VIII (Human Health) |
| May 7, 2003 | Submit monthly progress report |
| June 10, 2003 | Submit monthly progress report |
| June 23, 2003 | Submit revised EA Chapter IX and X (Ecology) |
| July 8, 2003 | Submit monthly progress report |
| July 21, 2003 | Start groundwater sampling (36 MW, sandbank) |
| August 8, 2003 | Submit monthly progress report |
| September 5, 2003 | Submit monthly progress report |
| October 8, 2003 | Submit monthly progress report |
| October 15, 2003 | Meeting between agencies and ROC (FS groundwater and soil) |
| October 10, 2003 | Submit monthly progress report |
| November 10, 2003 | Submit monthly progress report |
| December 8, 2003 | Submit monthly progress report |
| January 9, 2004 | Submit monthly progress report |
| February 6, 2004 | Submit monthly progress report |
| February 9, 2004 | OEPA comments regarding ecological assessment |
| March 15, 2004 | Submit monthly progress report |
| March 16, 2004 | US EPA Region V comments regarding EA and FS (OU-2) |
| April 7, 2004 | Submit monthly progress report |
| April 26, 2004 | Submit draft final EA |
| May 6, 2004 | OEPA comments regarding FS (OU-2) |
| May 7, 2004 | Submit monthly progress report |
| June 7, 2004 | Submit monthly progress report |
| July 9, 2004 | Submit monthly progress report |
| August 9, 2004 | Submit Monthly Progress Report |

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**NEASE CHEMICAL SITE, SALEM, OHIO
REMOVAL ACTION
MONTHLY PROGRESS REPORT
JULY 2004**

1.0 INTRODUCTION

This progress report has been prepared in accordance with Paragraph 14 of the "Order" section of the Administrative Order by Consent (AOC) Docket No. V-W-94-C-212, effective November 17, 1993, regarding a Removal Action at the Nease Chemical Site in Salem, Ohio. The report summarizes the major activities during the month along with investigation results and any problems encountered on the project. Activities planned for next month are also presented.

2.0 SUMMARY OF ACTIVITIES PERFORMED

2.1 Project Activity

The activities that were initiated and/or completed during this month are described below. Activities were performed in accordance with the Removal Action AOC.

OEPA, Northeast District Office conducted a compliance evaluation inspection of the Salem Site on April 30 and May 26, 2004. A follow-up letter from OEPA was submitted on June 28, 2004. ROC has responded in a letter dated July 30, 2004 and will also propose some modifications to the groundwater treatment plant.

2.2 Work Plan Preparation/Reports

No work plans/reports were submitted this period.

2.3 Fieldwork

2.3.1 Site Inspections

The results of the monthly site inspection carried out at the site in July 30, 2004 are shown in Attachment 1.

2.3.2 Monthly Water Level Measurements

The next water level measurements are planned for August 2004.

2.3.3 Treatment Plant Operation

The treatment plant operated mostly normal throughout the month (see Chapter 6).

2.4.1.1 Meetings

No meeting occurred during this month.

3.0 VARIATIONS FROM THE APPROVED REMOVAL ACTION WORK PLAN

There were no variations from the approved Removal Action Work Plan for the month.

4.0 RESULTS OF INSPECTIONS, ENVIRONMENTAL SAMPLING, TESTS AND ANALYSES

Water monitoring samples were collected from the treatment plant during June/July 2004. Attachment 2 and 3 include results from water and air samples collected on June 16, 2004 and July 6, 2004 (Lab: Exygen Research). The mid-July sampling results were not available at the time reporting. It will be included in the next monthly report.

5.0 PROJECT SCHEDULE

The updated Work Plan schedule identifies completion and target dates for project activities.

6.0 DIFFICULTIES ENCOUNTERED AND ACTION TAKEN TO RESOLVE PROBLEMS

On June 14, 2004, ROC informed OEPA that the influent tank of the onsite groundwater system had overflowed. The water level switch in the tank, which normally shuts down the pump of the leachate collection system at a certain water level reached in the tank, was not functioning because of iron precipitation. The water recovered from the collection system discharged to the floor inside the treatment plant building. Some portion of this water also discharged to the ground outside the building. There was no indication that water reached any drainage ditch. The discharge area is inside the capture zone of the groundwater collection system. Infiltrated water is expected to be recovered.

ROC promptly informed Joe Trocchio, OEPA site manager from the NE District Office and the Spill Hotline. A written notification was submitted to OEPA on June 15, 2004. Water on the floor was vacuumed up. The influent of the treatment system was sampled on June 16, 2004. The results were used to characterize the water. The results including an evaluation were submitted in a letter dated July 14, 2004 to OEPA.

On July 30, 2004, ROC responded to the follow-up letter from OEPA dated June 28, 2004. ROC is currently working on a proposal of treatment plant modifications to prevent an overrun of the influent tank. Appropriate containment of the unit is also under consideration.

7.0 PERSONNEL CHANGES

US EPA Region V named Mary Logan as the new Remedial Project Manager for the Nease Chemical Site.

8.0 TYPES AND QUANTITIES OF REMOVED MATERIALS

For the period from July 1 through July 31, 2004 the following material was removed:

- 15,000 gallons of leachate and/or backwash water were disposed off-site at a licensed treatment facility.
- Approximately 118,862 gallons were pumped from Leachate Collection System 1 (LCS-1) (total for LCS-1 = 16,609,258 gal).
- Approximately 7,182 gallons were pumped from Leachate Collection System 2 (LCS-2) (total for LCS-2 = 1,140,587 gal).
- 1,003 gallons of water were pumped from Pond 1 (total for the pond = 887,603 gallons).
- Approximately 12 pounds of organic compounds were removed during pumping (estimate based on average VOC/SVOC concentrations for each

source).

9.0 ANTICIPATED PROJECT ACTIVITIES FOR AUGUST 2004

Removal Action activities scheduled for the upcoming month include on-going implementation of the approved Removal Action Work Plan involving:

- Collection of groundwater from the existing collection systems LCS-1, LCS-2 and Pond 1.
- Monthly Progress Report

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Table 1
Nease Chemical Site, Salem, Ohio
Removal Action Schedule

| Date | Task/Activity/Deliverable/Milestone |
|--------------------|---|
| November 17, 1993 | Removal AOC Effective Date |
| November 17, 1993 | Commence Preparation of Removal Action Work Plan |
| November 23, 1993 | Submit Treatment Plant Performance Evaluation Work Plan (Rev. #1) |
| November 28, 1993 | USEPA Conditional Approval of TPPEWP |
| December 1, 1993 | Commence Treatment Plant Performance Evaluation |
| December 9, 1993 | Complete Treatment Plant Performance Evaluation |
| December 10, 1993 | Submit monthly progress report |
| December 17, 1993 | Submit Removal Action Work Plan (Rev #0) to USEPA |
| January 3, 1994 | USEPA Approval of TPPEWP (Rev #1) |
| January 10, 1994 | Submit monthly progress report |
| January 15, 1994 | Complete Treatment Plant Data Analysis and Evaluation |
| January 17, 1994 | Notify EPA of inability of Treatment Plant to meet proposed discharge criteria. Commence preparation of Treatment Plant Modifications Work Plan (TPMWP) |
| January 24, 1994 | USEPA disapproval of Removal Action Work Plan (Rev. #0) and associated comments |
| February 4, 1994 | Submit Revised Removal Action Work Plan (Rev #1) and Response to Agency comments |
| February 10, 1994 | Submit monthly progress report |
| February 11, 1994 | Submit Treatment Plant Performance Evaluation Report (TPPER) |
| March 2, 1994 | Submit Treatment Plant Modifications Work Plan (TPMWP, Rev. #0) |
| March 10, 1994 | Submit monthly progress report |
| April 10, 1994 | Submit monthly progress report |
| April 13, 1994 | Submit Revised Removal Action Work Plan (Rev #2) and Response to Agency comments |
| April 20, 1994 | Submit Revised TPMWP (Rev #1) and Response to Agency comments |
| May 10, 1994 | Submit monthly progress report |
| May 13, 1994 | Submit Updates (Rev #3) to Removal Action Work Plan (Rev #2) and Response to Agency comments |
| May 25, 1994 | USEPA approval of Revised RA Work Plan (Rev #2). Commence work on Work Plan implementation |
| May 25, 1994 | Commence Preparation of Removal Action WP Addendum |
| June 1, 1994 | Receipt of USEPA approval of Revised RA Work Plan (Rev #3) |
| June 10, 1994 | Submit monthly progress report |
| June 24, 1994 | Submit TPMWP (Rev #2) |
| July 10, 1994 | Submit monthly progress report |
| July 26, 1994 | Submit Treatment Plant Modifications Design Technical Memorandum (TPMDTM, Rev #0) |
| July 28, 1994 | Receipt of USEPA approval of TPMWP (Rev #2 with revised Table 4) |
| August 10, 1994 | Submit monthly progress report |
| August 30, 1994 | Submit Removal Action Work Plan Addendum (RAWPA) |
| September 10, 1994 | Submit monthly progress report |

| Date | Task/Activity/Deliverable/Milestone |
|----------------------------------|---|
| September 23, 1994 | Receipt of USEPA Comments or TPMDTM |
| October 3, 1994 | Submit TPMDTM (Rev #1) |
| October 4, 1994 | Submit TPMDTM (Rev #1) |
| October 10, 1994 | Submit monthly progress report |
| November 9, 1994 | Submit TPMDM (Rev #2) |
| November 10, 1994 | Submit monthly progress report |
| December 1, 1994 | Receipt of USEPA approval of TPMDTM (Rev #2) |
| December 10, 1994 | Submit monthly progress report |
| December 12-19, 1994 | RAWPA Extraction Well and Piezometer Installation |
| January 10, 1995 | Submit monthly progress report |
| January/February/ March, 1995 | Construction of TPMWP/TPMDTM measures |
| February 10, 1995 | Submit monthly progress report |
| March 10, 1995 | Submit monthly progress report |
| March 13-16, 1995 | Performance of Field Pumping Tests (E4 and S7) |
| April 10, 1995 | Submit monthly progress report |
| April 24, 1995 | Submit status report on RAWPA, Task 5 |
| May 4, 1995 | Start on-site treatment plant |
| May 10, 1995 | Submit monthly progress report |
| June 10, 1995 | Submit monthly progress report |
| July 10, 1995 | Submit monthly progress report |
| July 21, 1995 | Submit treatment plant 1 st month operation summary report |
| July 26, 1995 | Submit Cone penetrometer testing report and additional investigation plan |
| August 10, 1995 | Submit monthly progress report |
| September 10, 1995 | Submit monthly progress report |
| October 10, 1995 | Submit monthly progress report |
| November 10, 1995 | Submit monthly progress report |
| December 10, 1995 | Submit monthly progress report |
| January 8-12, 1996 | Conduct 2 nd Round of cone penetrometer testing on site |
| January 10, 1996 | Submit monthly progress report |
| February 10, 1996 | Submit monthly progress report |
| March 10, 1996 | Submit monthly progress report |
| April 10, 1996 | Submit monthly progress report |
| April 18, 1996 | Discontinue Outfall Discharge |
| April 24, 1996 | Agency Meeting – Discuss CPT results and future action plan |
| May 10, 1996 | Submit monthly progress report |
| May 23, 1996 | Submit 1996 IRM Seep Investigation and Fabric Barrier Work Plan |
| June 10, 1996 | Submit monthly progress report |
| July 8-12, 1996 | Install Piezometers and modify fabric barriers |
| July 10, 1996 | Submit monthly progress report |
| August 6, 1996 | Submit monthly progress report |
| September 10, 1996 | Submit monthly progress report |
| October 10, 1996 | Submit monthly progress report |

| Date | Task/Activity/Deliverable/Milestone |
|--------------------|---|
| November 10, 1996 | Submit monthly progress report |
| December 10, 1996 | Submit monthly progress report |
| January 10, 1997 | Submit monthly progress report |
| February 10, 1997 | Submit monthly progress report |
| March 10, 1997 | Submit monthly progress report |
| April 10, 1997 | Submit monthly progress report |
| May 9, 1997 | Submit monthly progress report |
| May 13, 1997 | Sample seep piezometers |
| June 9, 1997 | Submit monthly progress report |
| July 8, 1997 | Submit monthly progress report |
| August 8, 1997 | Submit monthly progress report |
| September 10, 1997 | Submit monthly progress report |
| October 10, 1997 | Submit monthly progress report |
| November 10, 1997 | Submit monthly progress report |
| December 10, 1997 | Submit monthly progress report |
| January 9, 1998 | Submit monthly progress report |
| February 10, 1998 | Submit monthly progress report |
| March 10, 1998 | Submit monthly progress report |
| April 8, 1998 | Submit monthly progress report |
| May 7, 1998 | Submit monthly progress report |
| June 9, 1998 | Submit monthly progress report |
| June 30, 1998 | Sample Seep Sheen |
| July 10, 1998 | Submit monthly progress report |
| August 7, 1998 | Submit monthly progress report |
| August 19, 1998 | Install 1 new fabric barrier and remove 1 old one |
| September 10, 1998 | Submit monthly progress report |
| October 9, 1998 | Submit monthly progress report |
| November 10, 1998 | Submit monthly progress report |
| December 10, 1998 | Submit monthly progress report |
| January 8, 1999 | Submit monthly progress report |
| February 10, 1999 | Submit monthly progress report |
| March 9, 1999 | Submit monthly progress report |
| April 9, 1999 | Submit monthly progress report |
| May 10, 1999 | Submit monthly progress report |
| June 9, 1999 | Submit monthly progress report |
| July 9, 1999 | Submit monthly progress report |
| August 9, 1999 | Submit monthly progress report |
| September 10, 1999 | Submit monthly progress report |
| October 8, 1999 | Submit monthly progress report |
| November 8, 1999 | Submit monthly progress report |
| December 9, 1999 | Submit monthly progress report |
| January 10, 2000 | Submit monthly progress report |
| February 10, 2000 | Submit monthly progress report |

| Date | Task/Activity/Deliverable/Milestone |
|--------------------|-------------------------------------|
| March 8, 2000 | Submit monthly progress report |
| April 4, 2000 | Submit monthly progress report |
| May 10, 2000 | Submit monthly progress report |
| June 8, 2000 | Submit monthly progress report |
| July 7, 2000 | Submit monthly progress report |
| August 8, 2000 | Submit monthly progress report |
| September 8, 2000 | Submit monthly progress report |
| October 4, 2000 | Submit monthly progress report |
| November 3, 2000 | Submit monthly progress report |
| December 8, 2000 | Submit monthly progress report |
| January 4, 2001 | Submit monthly progress report |
| February 6, 2001 | Submit monthly progress report |
| March 8, 2001 | Submit monthly progress report |
| April 9, 2001 | Submit monthly progress report |
| May 8, 2001 | Submit monthly progress report |
| June 6, 2001 | Submit monthly progress report |
| July 6, 2001 | Submit monthly progress report |
| August 7, 2001 | Submit monthly progress report |
| September 10, 2001 | Submit monthly progress report |
| October 5, 2001 | Submit monthly progress report |
| November 7, 2001 | Submit monthly progress report |
| December 7, 2001 | Submit monthly progress report |
| January 9, 2002 | Submit monthly progress report |
| February 8, 2002 | Submit monthly progress report |
| March 5, 2002 | Submit monthly progress report |
| April 5, 2002 | Submit monthly progress report |
| May 8, 2002 | Submit monthly progress report |
| June 5, 2002 | Submit monthly progress report |
| July 8, 2002 | Submit monthly progress report |
| August 9, 2002 | Submit monthly progress report |
| September 10, 2002 | Submit monthly progress report |
| October 10, 2002 | Submit monthly progress report |
| November 6, 2002 | Submit monthly progress report |
| December 10, 2002 | Submit monthly progress report |
| January 9, 2003 | Submit monthly progress report |
| February 7, 2003 | Submit monthly progress report |
| March 19, 2003 | Submit monthly progress report |
| April 7, 2003 | Submit monthly progress report |
| May 7, 2003 | Submit monthly progress report |
| June 10, 2003 | Submit monthly progress report |
| July 8, 2003 | Submit monthly progress report |
| August 8, 2003 | Submit monthly progress report |
| September 5, 2003 | Submit monthly progress report |
| October 8, 2003 | Submit monthly progress report |
| November 10, 2003 | Submit monthly progress report |
| December 8, 2003 | Submit monthly progress report |
| January 9, 2004 | Submit monthly progress report |
| February 6, 2004 | Submit monthly progress report |
| March 15, 2004 | Submit monthly progress report |
| April 7, 2004 | Submit monthly progress report |
| May 7, 2004 | Submit monthly progress report |
| June 7, 2004 | Submit monthly progress report |

| Date | Task/Activity/Deliverable/Milestone |
|----------------|-------------------------------------|
| July 9, 2004 | Submit monthly progress report |
| August 9, 2004 | Submit monthly progress report |

ATTACHMENT 1
RESULTS OF MONTHLY SITE INSPECTION
NEASE CHEMICAL SITE, SALEM, OHIO
JULY 2004

SITE INSPECTION FORM
RUETGERS-NEASE CORPORATION
Nease Site, Salem, Ohio

Date of Inspection: 7-30-04

Entry Time: 8:00 Exit Time: 12:30

Weather: RAIN + CLOUDS

Inspector's Name: DENNIS L. LANE

Inspector's Company: Howells and Baird, Inc.

INSPECTION RESULTS

SPECIFIC OBSERVATIONS: Structures

(Responses: S = Satisfactory U = Unsatisfactory Yes/No Levels Measured in Feet, N/A = Not Applicable)

| | Pump | Quick Connect | Water Level | Berm Erosion | Visible Leakage |
|--------------------------------------|------|---------------|-------------|--------------|-----------------|
| Leachate Collection System 1 (LCS-1) | S | S | 9.42 | N/A | No |
| Leachate Collection System 2 (LCS-2) | S | S | 7.19 | N/A | No |
| Pond 1 Pumphouse | S | S | 9.53 | N/A | No |
| Pond 1 Berm | N/A | N/A | N/A | No | No |
| Pond 2 Embankment | N/A | N/A | N/A | No | No |
| Exclusion Area A Embankment | N/A | N/A | N/A | No | No |
| Storage Tank | N/A | S | 4.92 | N/A | No |
| Other (specify) | | | | | |

SPECIFIC OBSERVATIONS:

Sediment Barriers

Condition of Sediment Barriers

| Barrier ID | Fabric Intact? | By Passing Evident? | Is Maintenance Necessary? |
|------------------------------|----------------|---------------------|---------------------------|
| Sediment Control Structure 1 | YES | No | No |
| Sediment Control Structure 2 | YES | No | No |
| Fabric Barrier 2 | YES | No | No |
| Fabric Barrier 3 | YES | No | No |
| Fabric Barrier 4 | YES | No | No |
| Fabric Barrier 5 | YES | No | No |
| Fabric Barrier 8 | YES | No | No |
| Fabric Barrier 9 | YES | No | No |
| Fabric Barrier 10 | YES | No | No |
| Rock Barrier 1 | YES | No | No |
| Rock Barrier 2 | YES | No | No |
| Pond 7 - North | YES | No | No |
| Pond 7 - South | YES | No | No |

SPECIFIC OBSERVATIONS:

Seeps (if present, use more forms, as necessary)

| Seep ID (yr-month-#) | Located on Map | Areal Extent (ft ²) | Magnitude (flow?, ponding?) |
|-------------------------|----------------|------------------------------------|--------------------------------|
| 94-7-1 | YES | 20 | Non-Flowing Seep |
| 96-8-2 | YES | 20 | Non-Flowing Seep |
| | | | |
| | | | |

Note: Seep ID # equal the "nth" observed seep during the yr-month in question.

ADDITIONAL OBSERVATION OR REMARKS:

Inspector's Name:

Dennis L. Lane

Inspector's Signature:

Dennis L. Lane

Date:

7-30-04

CRANE-DEMING COMPANY.

CRANE
DEMING
SWAMP

96-8-2

S1

ATTACHMENT 2

**WATER/AIR SAMPLING RESULTS – JUNE 16, 2004
NEASE CHEMICAL SITE, SALEM, OHIO**

RUTGERS ORGANICS CORPORATION
201 STRUBLE ROAD
STATE COLLEGE, PA 16801
Account Number: 155

Contact: RAINER DOMALSKI

Date Received: 17-JUN-04

Date Reported: 14-JUL-04

Invoice Number: 33580

Date Collected: 16-JUN-04

Client ID: INFLUENT 6-16-04

Lab ID: L35784-1

| PARAMETER | UNITS | RESULT | LIMIT OF QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|----------------------------|----------|--------|-----------------------------|-------------|-----------|---------|
| PESTICIDE ANALYSIS | | | | | | |
| KEPONE | ug/L | U .042 | .042 | SOP 6.2 | 25-JUN-04 | CS |
| PHOTOMIREX | ug/L | U .006 | .006 | SOP 6.2 | 25-JUN-04 | CS |
| MIREX | ug/L | .316 | .002 | SOP 6.2 | 25-JUN-04 | CS |
| PH | PH UNITS | 6.97 | 0 | EPA 150.1 | 14-JUL-04 | CMB |
| SEMI-VOLATILE ANALYSIS | | | | | | |
| ANTHRACENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| BENZO (A) ANTHRACENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| BENZO (K) FLUORANTHENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 3,4-BENZOFLUORANTHENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| BENZO (B) FLUORANTHENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| BENZO (G, H, I) PERYLENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| BENZO (A) PYRENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| CHRYSENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| DIBENZ (A, H) ANTHRACENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| FLUORENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| INDENO (1, 2, 3-CD) PYRENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| NAPHTHALENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| PHENANTHRENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| PYRENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| PHENOL | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 4-METHYLPHENOL | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 1,3-DICHLOROBENZENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 1,4-DICHLOROBENZENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 1,2-DICHLOROBENZENE | ug/L | 384 | 10 | EPA 8270C | 24-JUN-04 | CS |
| DIMETHYL PHTHALATE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| BUTYLBENZYL PHTHALATE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| DI-N-BUTYL PHTHALATE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 2-METHYLNAPHTHALENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 3,4-DICHLORONITROBENZENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| DIPHENYL SULFONE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| TOTAL DISSOLVED SOLIDS | mg/L | 411 | 10 | EPA 160.1 | 24-JUN-04 | STL |

RUTGERS ORGANICS CORPORATION
201 STRUBLE ROAD
STATE COLLEGE, PA 16801
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Invoice Number: 33580

Date Collected: 16-JUN-04

Client ID: INFLUENT 6-16-04

Lab ID: L35784-1

| PARAMETER | UNITS | RESULT | LIMIT OF QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------------|-------|--------|-----------------------------|-------------|-----------|---------|
| TOTAL SUSPENDED SOLIDS | mg/L | 21.2 | 4 | EPA 160.2 | 24-JUN-04 | STL |
| VOLATILE ANALYSIS | | | | | | |
| VINYL CHLORIDE | ug/L | 647 | 100 | EPA 8260B | 22-JUN-04 | JEG |
| DICHLOROMETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,1-DICHLOROETHENE | ug/L | 13 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| CIS-1,2-DICHLOROETHENE | ug/L | 10600 | 500 | EPA 8260B | 22-JUN-04 | JEG |
| TRANS-1,2-DICHLOROETHENE | ug/L | 43 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| CHLOROFORM | ug/L | 49 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,2-DICHLOROETHANE | ug/L | 198 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,1,1-TRICHLOROETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,1,2,2-TETRACHLOROETHANE | ug/L | 127 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,2-DICHLOROPROPANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| TRICHLOROETHENE | ug/L | 435 | 25 | EPA 8260B | 22-JUN-04 | JEG |
| BENZENE | ug/L | 445 | 25 | EPA 8260B | 22-JUN-04 | JEG |
| TETRACHLOROETHENE | ug/L | 950 | 25 | EPA 8260B | 22-JUN-04 | JEG |
| TOLUENE | ug/L | 58 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| CHLOROBENZENE | ug/L | 330 | 25 | EPA 8260B | 22-JUN-04 | JEG |
| ETHYLBENZENE | ug/L | 21 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| M, P-XYLENE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |
| O-XYLENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| ACETONE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |
| 2-BUTANONE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |
| CHLOROMETHANE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |
| CIS-1,3-DICHLOROPROPENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| TRANS-1,3-DICHLOROPROPENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| BROMOFORM | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| DIBROMOCHLOROMETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| BROMODICHLOROMETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| CARBON TETRACHLORIDE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| BROMOMETHANE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |

Comments: <none>

Submitted by
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Reviewed and Approved by:



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RUTGERS ORGANICS CORPORATION
201 STRUBLE ROAD
STATE COLLEGE, PA 16801
Account Number: 155

Contact: RAINER DOMALSKI

Date Received: 17-JUN-04
Date Reported: 14-JUL-04

Invoice Number: 33580

Date Collected: 16-JUN-04

Client ID: LGAC 2-3-6-16-04

Lab ID: L35784-2

| PARAMETER | UNITS | RESULT | LIMIT OF QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------------|----------|--------|-----------------------------|-------------|-----------|---------|
| PESTICIDE ANALYSIS | | | | | | |
| KEPONE | ug/L | U .042 | .042 | SOP 6.2 | 25-JUN-04 | CS |
| PHOTOMIREX | ug/L | U .006 | .006 | SOP 6.2 | 25-JUN-04 | CS |
| MIREX | ug/L | U .002 | .002 | SOP 6.2 | 25-JUN-04 | CS |
| PH | PH UNITS | 7.76 | 0 | EPA 150.1 | 14-JUL-04 | CMB |
| TOTAL DISSOLVED SOLIDS | mg/L | 358 | 10 | EPA 160.1 | 24-JUN-04 | STL |
| TOTAL SUSPENDED SOLIDS | mg/L | 0 | 4 | EPA 160.2 | 24-JUN-04 | STL |
| VOLATILE ANALYSIS | | | | | | |
| VINYL CHLORIDE | ug/L | < 20 | 20 | EPA 8260B | 22-JUN-04 | JEG |
| DICHLOROMETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,1-DICHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| CIS-1,2-DICHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| TRANS-1,2-DICHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| CHLOROFORM | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,2-DICHLOROETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,1,1-TRICHLOROETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,1,2,2-TETRACHLOROETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,2-DICHLOROPROPANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| TRICHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| BENZENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| TETRACHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| TOLUENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| CHLOROBENZENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| ETHYLBENZENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| M,P-XYLENE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |
| O-XYLENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| ACETONE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |
| 2-BUTANONE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |
| CHLOROMETHANE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |
| CIS-1,3-DICHLOROPROPENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| TRANS-1,3-DICHLOROPROPENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |

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| PARAMETER | UNITS | RESULT | LIMIT OF QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|----------------------|-------|--------|-----------------------------|-------------|-----------|---------|
| BROMOFORM | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| DIBROMOCHLOROMETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| BROMODICHLOROMETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| CARBON TETRACHLORIDE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| BROMOMETHANE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |

Comments: <none>

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RUTGERS ORGANICS CORPORATION
201 STRUBLE ROAD
STATE COLLEGE , PA 16801
Account Number: 155

Contact: RAINER DOMALSKI

Date Received: 17-JUN-04
Date Reported: 14-JUL-04

Invoice Number: 33580

Date Collected: 16-JUN-04

Client ID: OUTFALL 6-16-04

Lab ID: L35784-3

| PARAMETER | UNITS | RESULT | LIMIT OF QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------|-------|---------|-----------------------------|-------------|-----------|---------|
| SILVER-LOW LEVEL | mg/L | < .0003 | .0003 | EPA 6020 | 21-JUN-04 | JMS |
| ALUMINUM-LOW LEVEL | mg/L | .0716 | .0005 | EPA 6020 | 21-JUN-04 | JMS |
| ARSENIC-LOW LEVEL | mg/L | .0184 | .0003 | EPA 6020 | 21-JUN-04 | JMS |
| BERYLLIUM-LOW LEVEL | mg/L | < .0004 | .0004 | EPA 6020 | 21-JUN-04 | JMS |
| BOD-5 DAY | mg/L | < 2 | 2 | SM 5210 | 18-JUN-04 | TGA |
| CADMIUM-LOW LEVEL | mg/L | < .0003 | .0003 | EPA 6020 | 21-JUN-04 | JMS |
| CYANIDE-FREE | mg/L | < .005 | .005 | EPA 335.4 | 23-JUN-04 | JPB |
| COD | mg/L | < 10 | 10 | EPA 410.4 | 25-JUN-04 | STL |
| CHROMIUM-LOW LEVEL | mg/L | < .0006 | .0006 | EPA 6020 | 21-JUN-04 | JMS |
| COPPER-LOW LEVEL | mg/L | .00107 | .001 | EPA 6020 | 21-JUN-04 | JMS |
| IRON-LOW LEVEL | mg/L | .452 | .0005 | EPA 6020 | 21-JUN-04 | JMS |
| MERCURY | mg/L | < .0002 | .0002 | EPA 7470A | 30-JUL-04 | STL |
| PESTICIDE ANALYSIS | | | | | | |
| KEPONE | ug/L | U .042 | .042 | SOP 6.2 | 25-JUN-04 | CS |
| PHOTOMIREX | ug/L | U .006 | .006 | SOP 6.2 | 25-JUN-04 | CS |
| MIREX | ug/L | U .002 | .002 | SOP 6.2 | 25-JUN-04 | CS |
| AMMONIA | mg/L | .31 | .1 | EPA 350.1 | 01-JUL-04 | STL |
| NICKEL-LOW LEVEL | mg/L | .00481 | .0006 | EPA 6020 | 21-JUN-04 | JMS |
| OIL & GREASE | mg/L | < 10 | 10 | EPA 1664A | 10-JUL-04 | STL |

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Client ID: OUTFALL 6-16-04

Lab ID: L35784-3

| PARAMETER | UNITS | RESULT | LIMIT OF QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|-------------------------------------|----------|---------|-----------------------------|-------------|-----------|---------|
| LEAD-LOW LEVEL | mg/L | < .0003 | .0003 | EPA 200.8 | 21-JUN-04 | JMS |
| PESTICIDE/PCB ANALYSIS GAMMA-BHC | ug/L | < .02 | .02 | EPA 8081 | 24-JUN-04 | CAS |
| PH | PH UNITS | 8.21 | 0 | EPA 150.1 | 14-JUL-04 | CMB |
| ANTIMONY-LOW LEVEL | mg/L | < .0004 | .0004 | EPA 6020 | 21-JUN-04 | JMS |
| SEMI-VOLATILE ANALYSIS | | | | | | |
| ANTHRACENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| BENZO (A) ANTHRACENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| BENZO (K) FLUORANTHENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 3,4-BENZOFUORANTHENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| BENZO (B) FLUORANTHENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| BENZO (G, H, I) PERYLENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| BENZO (A) PYRENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| CHRYSENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| DIBENZ (A, H) ANTHRACENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| FLUORENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| INDENO (1, 2, 3-CD) PYRENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| NAPHTHALENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| PHENANTHRENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| PYRENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| PHENOL | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 4-METHYLPHENOL | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 1,3-DICHLOROBENZENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 1,4-DICHLOROBENZENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 1,2-DICHLOROBENZENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| DIMETHYL PHTHALATE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| BUTYLBENZYL PHTHALATE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| DI-N-BUTYL PHTHALATE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 2-METHYLNAPHTHALENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| 3,4-DICHLORONITROBENZENE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |
| DIPHENYL SULFONE | ug/L | < 10 | 10 | EPA 8270C | 24-JUN-04 | CS |

RUTGERS ORGANICS CORPORATION
201 STRUBLE ROAD
STATE COLLEGE, PA 16801
Account Number: 155

Contact: RAINER DOMALSKI

Date Received: 17-JUN-04
Date Reported: 14-JUL-04

Invoice Number: 33580

Date Collected: 16-JUN-04

Client ID: OUTFALL 6-16-04

Lab ID: L35784-3

| PARAMETER | UNITS | RESULT | LIMIT OF QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------------|-------|---------|-----------------------------|-------------|-----------|---------|
| TOTAL DISSOLVED SOLIDS | mg/L | 352 | 10 | EPA 160.1 | 24-JUN-04 | STL |
| THALLIUM-LOW LEVEL | mg/L | < .0002 | .0002 | EPA 6020 | 21-JUN-04 | JMS |
| TOTAL ORGANIC CARBON | mg/L | < 1 | 1 | EPA 415.1 | 24-JUN-04 | STL |
| TOTAL SUSPENDED SOLIDS | mg/L | < 4 | 4 | EPA 160.2 | 24-JUN-04 | STL |
| VOLATILE ANALYSIS | | | | | | |
| VINYL CHLORIDE | ug/L | < 20 | 20 | EPA 8260B | 30-JUN-04 | JEG |
| DICHLOROMETHANE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| 1,1-DICHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| CIS-1,2-DICHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| TRANS-1,2-DICHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| CHLOROFORM | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| 1,2-DICHLOROETHANE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| 1,1,1-TRICHLOROETHANE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| 1,1,2,2-TETRACHLOROETHANE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| 1,2-DICHLOROPROPANE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| TRICHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| BENZENE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| TETRACHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| TOLUENE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| CHLOROBENZENE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| ETHYLBENZENE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| M, P-XYLENE | ug/L | < 10 | 10 | EPA 8260B | 30-JUN-04 | JEG |
| O-XYLENE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| ACETONE | ug/L | < 10 | 10 | EPA 8260B | 30-JUN-04 | JEG |
| 2-BUTANONE | ug/L | < 10 | 10 | EPA 8260B | 30-JUN-04 | JEG |
| CHLOROMETHANE | ug/L | < 10 | 10 | EPA 8260B | 30-JUN-04 | JEG |
| CIS-1,3-DICHLOROPROPENE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| TRANS-1,3-DICHLOROPROPENE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| BROMOFORM | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| DIBROMOCHLOROMETHANE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| BROMODICHLOROMETHANE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |
| CARBON TETRACHLORIDE | ug/L | < 5 | 5 | EPA 8260B | 30-JUN-04 | JEG |

RUTGERS ORGANICS CORPORATION
201 STRUBLE ROAD
STATE COLLEGE, PA 16801
Account Number: 155

Contact: RAINER DOMALSKI

Date Received: 17-JUN-04
Date Reported: 14-JUL-04

Invoice Number: 33580

Date Collected: 16-JUN-04

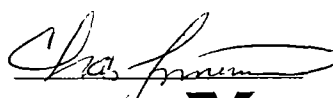
Client ID: OUTFALL 6-16-04

Lab ID: L35784-3

| PARAMETER | UNITS | RESULT | LIMIT OF QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|----------------|-------|--------|-----------------------------|-------------|-----------|---------|
| BROMOMETHANE | ug/L | < 10 | 10 | EPA 8260B | 30-JUN-04 | JEG |
| ZINC-LOW LEVEL | mg/L | .00355 | .0005 | EPA 6020 | 21-JUN-04 | JMS |

Comments: <none>

Submitted by
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Reviewed and Approved by:



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RUTGERS ORGANICS CORPORATION
201 STRUBLE ROAD
STATE COLLEGE, PA 16801
Account Number: 155

Contact: RAINER DOMALSKI

Date Received: 17-JUN-04
Date Reported: 13-JUL-04

Invoice Number: 33580

Date Collected: 15-JUN-04

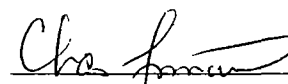
Client ID: TRIP BLANK

Lab ID: L35784-4

| PARAMETER | UNITS | RESULT | LIMIT OF QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------------|-------|--------|-----------------------------|-------------|-----------|---------|
| VOLATILE ANALYSIS | | | | | | |
| VINYL CHLORIDE | ug/L | < 20 | 20 | EPA 8260B | 22-JUN-04 | JEG |
| DICHLOROMETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,1-DICHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| CIS-1,2-DICHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| TRANS-1,2-DICHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| CHLOROFORM | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,2-DICHLOROETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,1,1-TRICHLOROETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,1,2,2-TETRACHLOROETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| 1,2-DICHLOROPROPANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| TRICHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| BENZENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| TETRACHLOROETHENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| TOLUENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| CHLOROBENZENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| ETHYLBENZENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| M,P-XYLENE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |
| O-XYLENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| ACETONE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |
| 2-BUTANONE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |
| CHLOROMETHANE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |
| CIS-1,3-DICHLOROPROPENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| TRANS-1,3-DICHLOROPROPENE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| BROMOFORM | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| DIBROMOCHLOROMETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| BROMODICHLOROMETHANE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| CARBON TETRACHLORIDE | ug/L | < 5 | 5 | EPA 8260B | 22-JUN-04 | JEG |
| BROMOMETHANE | ug/L | < 10 | 10 | EPA 8260B | 22-JUN-04 | JEG |

Comments: <none>

Submitted by
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Reviewed and Approved by:



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RUTGERS ORGANICS CORPORATION/EHS DEPT.
201 STRUBLE ROAD
STATE COLLEGE, PA 16801
ACCOUNT: 155

Date Received: 17-Jun-04

Date Reported: 12-Jul-04

Invoice Number: 33580

Contact: RAINER DOMALSKI

Date Collected: 16-Jun-04

Client ID: AGAC-1-2-6-16-04

Lab ID: L35784-5

| PARAMETER | UNITS | RESULT | LIMIT OF QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------------|-----------|--------|-----------------------------|--------------|-----------|---------|
| VOLATILE ANALYSIS | | | | | | |
| BROMODICHLOROMETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| BROMOFORM | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| DIBROMOCHLOROMETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| DIBROMOMETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| TRANS-1,2-DICHLOROETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CUMENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| N-PROPYLBENZENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,2,3-TRICHLOROPROPANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| DICHLORODIFLUOROMETHANE | ppb (v/v) | < 2.0 | 2.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| VINYL CHLORIDE | ppb (v/v) | < 2.0 | 2.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CHLOROETHANE | ppb (v/v) | < 2.0 | 2.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| TRICHLOROFLUOROMETHANE | ppb (v/v) | < 2.0 | 2.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,1-DICHLOROETHENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,1-DICHLOROETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CIS-1,2-DICHLOROETHENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CHLOROFORM | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,1,1-TRICHLOROETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CARBON TETRACHLORIDE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| BENZENE | ppb (v/v) | 2.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,2-DICHLOROETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| TRICHLOROETHENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,2-DICHLOROPROPANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CIS-1,3-DICHLOROPROPENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| TOLUENE | ppb (v/v) | 48 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| TRANS-1,3-DICHLOROPROPENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,1,2-TRICHLOROETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| TETRACHLOROETHENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,2-DIBROMOETHANE (EDB) | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CHLOROBENZENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| ETHYLBENZENE | ppb (v/v) | 7.2 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| M,P-XYLENE | ppb (v/v) | 19 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| O-XYLENE | ppb (v/v) | 6.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| STYRENE | ppb (v/v) | 4.3 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |

RUTGERS ORGANICS CORPORATION/EHS DEPT.
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STATE COLLEGE, PA 16801
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Invoice Number: 33580

Contact: RAINER DOMALSKI

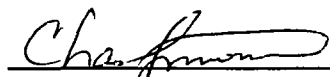
Date Collected: 16-Jun-04

Client ID: AGAC-1-2-6-16-04

Lab ID: L35784-5

| PARAMETER | UNITS | RESULT | LIMIT OF | | | |
|---------------------------|-----------|--------|--------------|--------------|-----------|---------|
| | | | QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
| 1,1,2,2-TETRACHLOROETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,3,5-TRIMETHYLBENZENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,3-DICHLOROBENZENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,4-DICHLOROBENZENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,2-DICHLOROBENZENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |

Submitted by
Exygen Research
Reviewed and Approved by:


Charles Simons
Laboratory Manager

RUTGERS ORGANICS CORPORATION/EHS DEPT.
201 STRUBLE ROAD
STATE COLLEGE, PA 16801
ACCOUNT: 155

Contact: RAINER DOMALSKI

Client ID: AGAC-1-2-6-16-04

Lab ID: L35784-5

Date Received: 17-Jun-04

Date Reported: 12-Jul-04

Invoice Number: 33580

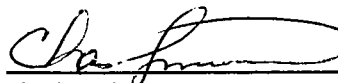
Date Collected: 16-Jun-04

MASS SPECTROMETER/DATA SYSTEM (MSDS) TENTATIVELY IDENTIFIED COMPOUNDS

| PARAMETER | UNITS | ESTIMATED RESULT | RETENTION TIME | TEST METHOD | TEST DATE | ANALYST |
|--------------------------------|-----------|---------------------|-------------------|--------------|-----------|---------|
| UNKNOWN | ppb (v/v) | 14 NJ | M 4.3951 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 63 NJ | M 4.5242 | EPA-19 TO-14 | 25-Jun-04 | STL |
| ETHANOL | ppb (v/v) | 13 NJ | M 5.3204 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 75 NJ | M 5.6109 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 16 NJ | M 5.9821 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 66 NJ | M 6.1004 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 5.5 NJ | M 6.8858 | EPA-19 TO-14 | 25-Jun-04 | STL |
| PENTANE, 2-METHYL- | ppb (v/v) | 7.7 NJ | M 7.9133 | EPA-19 TO-14 | 25-Jun-04 | STL |
| PENTANE, 3-METHYL- | ppb (v/v) | 6.6 NJ | M 8.3867 | EPA-19 TO-14 | 25-Jun-04 | STL |
| HEXANE | ppb (v/v) | 13 NJ | M 8.9462 | EPA-19 TO-14 | 25-Jun-04 | STL |
| ETHYL ACETATE | ppb (v/v) | 11 NJ | M 9.538 | EPA-19 TO-14 | 25-Jun-04 | STL |
| HEXANE, 3-METHYL | ppb (v/v) | 5.9 NJ | M 11.636 | EPA-19 TO-14 | 25-Jun-04 | STL |
| HEPTANE | ppb (v/v) | 6.4 NJ | M 12.405 | EPA-19 TO-14 | 25-Jun-04 | STL |
| METHYL ISOBUTYL KETONE | ppb (v/v) | 5.4 NJ | M 13.626 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 6.4 NJ | M 15.175 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1R-.ALPHA.-PINENE | ppb (v/v) | 4.8 NJ | M 18.204 | EPA-19 TO-14 | 25-Jun-04 | STL |
| BENZENE, 1-ETHYL-3-METHYL- | ppb (v/v) | 2.3 NJ | M 18.591 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 3.1 NJ | M 18.914 | EPA-19 TO-14 | 25-Jun-04 | STL |
| DECANE | ppb (v/v) | 10 NJ | M 18.963 | EPA-19 TO-14 | 25-Jun-04 | STL |
| BENZENE, 1,2,3-TRIMETHYL- | ppb (v/v) | 8.6 NJ | M 19.108 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 2.7 NJ | M 19.323 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 2.3 NJ | M 19.355 | EPA-19 TO-14 | 25-Jun-04 | STL |
| LIMONENE | ppb (v/v) | 11 NJ | M 19.581 | EPA-19 TO-14 | 25-Jun-04 | STL |
| BENZENE, 1,2-DIETHYL- | ppb (v/v) | 2.2 NJ | M 19.904 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNDECANE | ppb (v/v) | 6.0 NJ | M 20.216 | EPA-19 TO-14 | 25-Jun-04 | STL |
| BENZENE, 1,3-DICHLORO-2-METHYL | ppb (v/v) | 8.1 NJ | M 20.888 | EPA-19 TO-14 | 25-Jun-04 | STL |

M: Result was measured against nearest internal standard assuming a response factor of 1.

Submitted by
Exygen Research
Reviewed and Approved by:


Charles Simmons
Laboratory Manager

RUTGERS ORGANICS CORPORATION/EHS DEPT.
201 STRUBLE ROAD
STATE COLLEGE, PA 16801
ACCOUNT: 155

Date Received: 17-Jun-04
Date Reported: 12-Jul-04

Invoice Number: 33580

Contact: RAINER DOMALSKI

Date Collected: 16-Jun-04

Client ID: AGAC-F-6-16-04

Lab ID: L35784-6

| PARAMETER | UNITS | RESULT | LIMIT OF QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|---------------------------|-----------|--------|-----------------------------|--------------|-----------|---------|
| VOLATILE ANALYSIS | | | | | | |
| BROMODICHLOROMETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| BROMOFORM | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| DIBROMOCHLOROMETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| DIBROMOMETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| TRANS-1,2-DICHLOROETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CUMENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| N-PROPYLBENZENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,2,3-TRICHLOROPROPANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| DICHLORODIFLUOROMETHANE | ppb (v/v) | < 2.0 | 2.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| VINYL CHLORIDE | ppb (v/v) | < 2.0 | 2.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CHLOROETHANE | ppb (v/v) | < 2.0 | 2.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| TRICHLOROFLUOROMETHANE | ppb (v/v) | 3.2 | 2.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,1-DICHLOROETHENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,1-DICHLOROETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CIS-1,2-DICHLOROETHENE | ppb (v/v) | 2.6 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CHLOROFORM | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,1,1-TRICHLOROETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CARBON TETRACHLORIDE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| BENZENE | ppb (v/v) | 1.1 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,2-DICHLOROETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| TRICHLOROETHENE | ppb (v/v) | 4.5 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,2-DICHLOROPROPANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CIS-1,3-DICHLOROPROPENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| TOLUENE | ppb (v/v) | 35 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| TRANS-1,3-DICHLOROPROPENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,1,2-TRICHLOROETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| TETRACHLOROETHENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,2-DIBROMOETHANE (EDB) | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CHLOROBENZENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| ETHYLBENZENE | ppb (v/v) | 7.2 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| M, P-XYLENE | ppb (v/v) | 16 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| O-XYLENE | ppb (v/v) | 4.7 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| STYRENE | ppb (v/v) | 3.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |

RUTGERS ORGANICS CORPORATION/EHS DEPT.
201 STRUBLE ROAD
STATE COLLEGE, PA 16801
ACCOUNT: 155

Date Received: 17-Jun-04
Date Reported: 12-Jul-04

Invoice Number: 33580

Contact: RAINER DOMALSKI

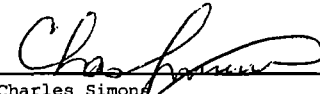
Date Collected: 16-Jun-04

Client ID: AGAC-F-6-16-04

Lab ID: L35784-6

| PARAMETER | UNITS | RESULT | LIMIT OF | | | |
|---------------------------|-----------|--------|--------------|--------------|-----------|---------|
| | | | QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
| 1,1,2,2-TETRACHLOROETHANE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,3,5-TRIMETHYLBENZENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,3-DICHLOROBENZENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,4-DICHLOROBENZENE | ppb (v/v) | < 1.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,2-DICHLOROBENZENE | ppb (v/v) | 4.0 | 1.0 | EPA-19 TO-14 | 25-Jun-04 | STL |

Submitted by
Exygen Research
Reviewed and Approved by:


Charles Simon
Laboratory Manager

RUTGERS ORGANICS CORPORATION/EHS DEPT.
201 STRUBLE ROAD
STATE COLLEGE, PA 16801
ACCOUNT: 155

Date Received: 17-Jun-04
Date Reported: 12-Jul-04

Invoice Number: 33580

Contact: RAINER DOMALSKI

Date Collected: 16-Jun-04

Client ID: AGAC-F-6-16-04


Lab ID: L35784-5

MASS SPECTROMETER/DATA SYSTEM (MSDS) TENTATIVELY IDENTIFIED COMPOUNDS

| PARAMETER | UNITS | ESTIMATED RESULT | RETENTION TIME | TEST METHOD | TEST DATE | ANALYST |
|--------------------------------|-----------|---------------------|-------------------|--------------|-----------|---------|
| UNKNOWN | ppb (v/v) | 8.5 NJ | M 4.0723 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 8.5 NJ | M 4.3951 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 190 NJ | M 4.5834 | EPA-19 TO-14 | 25-Jun-04 | STL |
| ETHANOL | ppb (v/v) | 5.0 NJ | M 5.3903 | EPA-19 TO-14 | 25-Jun-04 | STL |
| BUTANE-2-METHYL- | ppb (v/v) | 44 NJ | M 5.6109 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 10 NJ | M 5.9874 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 17 NJ | M 6.1058 | EPA-19 TO-14 | 25-Jun-04 | STL |
| ACETIC ACID, METHYL ESTER | ppb (v/v) | 7.5 NJ | M 6.8858 | EPA-19 TO-14 | 25-Jun-04 | STL |
| METHYLENE CHLORIDE | ppb (v/v) | 4.1 NJ | M 7.0095 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 5.7 NJ | M 7.9187 | EPA-19 TO-14 | 25-Jun-04 | STL |
| PENTANE, 3-METHYL- | ppb (v/v) | 5.5 NJ | M 8.3867 | EPA-19 TO-14 | 25-Jun-04 | STL |
| HEXANE | ppb (v/v) | 12 NJ | M 8.9462 | EPA-19 TO-14 | 25-Jun-04 | STL |
| ETHYL ACETATE | ppb (v/v) | 9.2 NJ | M 9.5379 | EPA-19 TO-14 | 25-Jun-04 | STL |
| CYCLOPENTANE, METHYL- | ppb (v/v) | 3.9 NJ | M 10.092 | EPA-19 TO-14 | 25-Jun-04 | STL |
| PENTANE, 2,3-DIMETHYL- | ppb (v/v) | 3.2 NJ | M 11.442 | EPA-19 TO-14 | 25-Jun-04 | STL |
| HEXANE, 3-METHYL- | ppb (v/v) | 10 NJ | M 11.636 | EPA-19 TO-14 | 25-Jun-04 | STL |
| HEPTANE | ppb (v/v) | 10 NJ | M 12.405 | EPA-19 TO-14 | 25-Jun-04 | STL |
| METHYL ISOBUTYL KETONE | ppb (v/v) | 7.4 NJ | M 13.637 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 5.0 NJ | M 15.181 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 2.2 NJ | M 17.553 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1R-ALPHA,-PINENE | ppb (v/v) | 2.7 NJ | M 18.204 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 1.9 NJ | M 18.914 | EPA-19 TO-14 | 25-Jun-04 | STL |
| DECANE | ppb (v/v) | 4.6 NJ | M 18.963 | EPA-19 TO-14 | 25-Jun-04 | STL |
| BENZENE, 1,2,4-TRIMETHYL- | ppb (v/v) | 6.6 NJ | M 19.108 | EPA-19 TO-14 | 25-Jun-04 | STL |
| UNKNOWN | ppb (v/v) | 1.4 NJ | M 19.323 | EPA-19 TO-14 | 25-Jun-04 | STL |
| 1,4-CYCLOHEXADIENE, 1-METHYL-4 | ppb (v/v) | 1.4 NJ | M 19.355 | EPA-19 TO-14 | 25-Jun-04 | STL |
| LIMONENE | ppb (v/v) | 7.0 NJ | M 19.581 | EPA-19 TO-14 | 25-Jun-04 | STL |

M: Result was measured against nearest internal standard assuming a response factor of 1.

Submitted by
Oxygen Research
Reviewed and Approved by:


Charles Simons
Laboratory Manager

NARRATIVE

Exygen Research (PADEP ID# 14-347)

Project: L35784

Sample Receipt:

Samples were received on June 17, 2004. The samples were received in two sample coolers at 3.6°C, and 4.0°C.

Sample Analysis:

EPA Method 8260 surrogate dibromofluoromethane was recovered out of range at 82%. Acceptable recoveries for this surrogate compound should fall between 86-118%. The analysis was repeated with a similar surrogate recovery. The outlier was attributed to the sample matrix.

There were no other problems related to the analysis of these samples.

Holding Times:

Samples were analyzed within holding times.

Sub-contract Laboratories:

Todd Giddings and Associates of State College, PA (PADEP ID# 14-321) performed the BOD analysis on these samples.

Severn Trent Laboratories (STL) of Pittsburgh, PA (PADEP ID# 02-416) performed the COD, total organic carbon, total suspended solids, total dissolved solids, mercury, ammonia nitrogen, free cyanide, and oil and grease analysis.

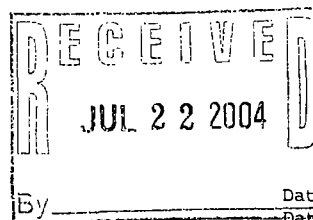
Severn Trent Laboratories (STL) of Knoxville, TN (PADEP ID# 68-576) performed the GC/MS volatiles (air) analysis.

ATTACHMENT 3

**WATER/AIR SAMPLING RESULTS – JULY 6, 2004
NEASE CHEMICAL SITE, SALEM, OHIO**

RUTGERS ORGANICS CORPORATION
201 STRUBLE ROAD
STATE COLLEGE, PA 16801
Account Number: 155

Contact: RAINER DOMALSKI



Date Received: 07-JUL-04
Date Reported: 20-JUL-04

Invoice Number: 33580

Date Collected: 06-JUL-04

Client ID: INFLUENT 7-6-04

Lab ID: L35016-1

| PARAMETER | UNITS | RESULT | LIMIT OF QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|-----------------|-------|--------|-----------------------------|-------------|-----------|---------|
| AMMONIA | mg/L | 1.4 | .1 | EPA 350.1 | 15-JUL-04 | STL |
| NITRATE+NITRITE | mg/L | < .1 | .1 | EPA 353.2 | 15-JUL-04 | STL |
| PHOSPHORUS | mg/L | < .1 | .1 | EPA 365.2 | 16-JUL-04 | STL |

Comments: <none>

Submitted by
Exygen Research
Reviewed and Approved by:

Charles Simons
Laboratory Manager
3058 Research Drive
State College, PA 16801, USA

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exygen.com

RUTGERS ORGANICS CORPORATION
201 STRUBLE ROAD
STATE COLLEGE , PA 16801
Account Number: 155

Contact: RAINER DOMALSKI

Date Received: 07-JUL-04
Date Reported: 20-JUL-04

Invoice Number: 33580

Date Collected: 06-JUL-04

Client ID: OUTFALL 7-6-04

Lab ID: L35816-2

| PARAMETER | UNITS | RESULT | LIMIT OF QUANTITATION | TEST METHOD | TEST DATE | ANALYST |
|-----------------|-------|--------|-----------------------------|-------------|-----------|---------|
| AMMONIA | mg/L | 1.2 | .1 | EPA 350.1 | 15-JUL-04 | STL |
| NITRATE+NITRITE | mg/L | < .1 | .1 | EPA 353.2 | 15-JUL-04 | STL |
| PHOSPHORUS | mg/L | < .1 | .1 | EPA 365.2 | 16-JUL-04 | STL |

Comments: <none>

Submitted by
Exygen Research
Reviewed and Approved by:



Charles Simons
Laboratory Manager
3058 Research Drive
State College, PA 16801, USA

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exygen.com

NARRATIVE

Exygen Research (PADEP ID# 14-347)

Project: L35816

Sample Receipt:

Samples were received on July 7, 2004. The samples were received in one sample cooler at 22.4°C. Sample temperature should not exceed 6.0 °C.

Sample Analysis:

There were no problems related to the analysis of these samples.

Holding Times:

The samples were analyzed within holding time.

Sub-contract Laboratories:

Severn Trent Laboratories (STL) of Pittsburgh, PA (PADEP ID# 02-416) performed the ammonia nitrogen analysis on these samples. Severn Trent Laboratories (STL) of North Canton, OH (PADEP ID# 68-340) performed the phosphorus analysis on these samples.

